

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☒ SUPERSEDING
OFFENSE CHARGED

SEE ATTACHED.

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: SEE ATTACHED.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

FILED

ANTHONY REED

NOV 29 2018

DISTRICT COURT NUMBER
CR 18-0560 HSGSUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
OAKLAND OFFICE**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)

☐ person is awaiting trial in another Federal or State Court,
give name of court

☐ this person/proceeding is transferred from another district
per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
charges previously dismissed
which were dismissed on motion
of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
pending case involving this same
defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s)
before U.S. Magistrate regarding this
defendant were recorded under

 Name and Office of Person
Furnishing Information on this form ALEX G. TSE

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
Attorney (if assigned) Samantha Schott
DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☒ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
been filed? ☐ No

 If "Yes"
give date
filed
DATE OF
ARREST
 Month/Day/Year
11/19/2018

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
warrant needed, since Magistrate has scheduled arraignment.

Date/Time: _____ Before Judge: _____

Comments:

Penalty Sheet for ANTHONY REED

Count One (Conspiracy to Deal in Firearms Without a License):

Maximum prison term: 5 years

Maximum fine: \$250,000.

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Counts Three through Eight, Ten (Dealing Firearms Without a License):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Counts Eleven and Twelve (Traveling Interstate to Promote Illegal Firearms Trafficking):

Maximum prison term: 10 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Thirteen (Conspiracy to Commit Robbery of Mail, Money, or Other Property of the United States and Assault on a Federal Officer):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Fourteen (Assault on a Federal Officer With a Deadly or Dangerous Weapon):

Maximum prison term: 20 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Fifteen (Robbery of Mail, Money, or Other Property of the United States):

Maximum prison term: 25 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Sixteen (Using, Carrying, and Brandishing a Firearm During, in Relation to, a Crime of Violence):

Mandatory minimum prison term: 7 years

Maximum prison term: Life

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☒ SUPERSEDING
OFFENSE CHARGED
 Count 1: 18 U.S.C. § 371 - Conspiracy to Commit Unlicensed
 Dealing in Firearms
 Counts 3 and 4: 18 U.S.C. § 922(a)(1)(A) - Unlicensed Dealing
 in Firearms

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: SEE ATTACHED.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.**FILED**

BENJAMIN GORMLEY

NOV 29 2018

DISTRICT COURT NUMBER

CR 18-0560 HSG

 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTH DISTRICT OF CALIFORNIA
 OAKLAND OFFICE
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

Name and Office of Person

Furnishing Information on this form ALEX G. TSE

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Samantha Schott

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

 1) ☐ If not detained give date any prior
 summons was served on above charges
2) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

Penalty Sheet for BENJAMIN GORMLEY

Count One (Conspiracy to Deal in Firearms Without a License):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Counts Three and Four (Dealing Firearms Without a License):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☒ SUPERSEDING**OFFENSE CHARGED**

SEE ATTACHED

- ☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: SEE ATTACHED.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

FILED

JESUS ANGEL SANCHEZ

NOV 29 2018

DISTRICT COURT NUMBER

CR 18-0560 HSG

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
OAKLAND OFFICE**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☐ this prosecution relates to a pending case involving this same defendantMAGISTRATE
CASE NO.☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) ☐ If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☒ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARRESTMonth/Day/Year
11/19/2018

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

Name and Office of Person

Furnishing Information on this form ALEX G. TSE

☒ U.S. Attorney ☐ Other U.S. AgencyName of Assistant U.S.
Attorney (if assigned)

Samantha Schott

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

Penalty Sheet for JESUS ANGEL SANCHEZ

Count One (Conspiracy to Deal in Firearms Without a License):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Counts Seven, Eight and Ten (Dealing Firearms Without a License):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Thirteen (Conspiracy to Commit Robbery of Mail, Money, or Other Property of the United States and Assault on a Federal Officer):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Fourteen (Assault on a Federal Officer With a Deadly or Dangerous Weapon):

Maximum prison term: 20 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Fifteen (Robbery of Mail, Money, or Other Property of the United States):

Maximum prison term: 25 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Sixteen (Using, Carrying, and Brandishing a Firearm During, in Relation to, a Crime of Violence):

Mandatory minimum prison term: 7 years

Maximum prison term: Life

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 Count 1: 18 U.S.C. § 371 - Conspiracy to Commit Unlicensed
 Dealing in Firearms
 Counts 2 and 9: 18 U.S.C. § 922(a)(1)(A) - Unlicensed Dealing
 in Firearms

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: SEE ATTACHED.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.**FILED**

JULAAN FAISON

NOV 29 2018
 DISTRICT COURT NUMBER
 CR 18-0560 HSG

 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTH DISTRICT OF CALIFORNIA
 OAKLAND OFFICE
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

Name and Office of Person

Furnishing Information on this form ALEX G. TSE

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Samantha Schott

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

 1) ☒ If not detained give date any prior
 summons was served on above charges
2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed

**DATE OF
 ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
 TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

Penalty Sheet for JULAAN FAISON

Count One (Conspiracy to Deal in Firearms Without a License):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Counts Two and Nine (Dealing Firearms Without a License):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☒ SUPERSEDING
OFFENSE CHARGED

SEE ATTACHED.

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: SEE ATTACHED.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

FILED

RAHSAAN FAISON

NOV 29 2018

DISTRICT COURT NUMBER

CR 18-0560 HSG

 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTH DISTRICT OF CALIFORNIA
 OAKLAND OFFICE
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

Name and Office of Person

Furnishing Information on this form ALEX G. TSE

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Samantha Schott

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)
- ☐
- If not detained give date any prior
-
- summons was served on above charges
-
- 2)
- ☐
- Is a Fugitive
-
- 3)
- ☐
- Is on Bail or Release from (show District)

IS IN CUSTODY

- 4)
- ☒
- On this charge
-
- 5)
- ☐
- On another conviction }
- ☐
- Federal
- ☐
- State
-
- 6)
- ☐
- Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
DATE OF
ARREST
 Month/Day/Year
 11/19/2018

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

Penalty Sheet for RAHSAAN FAISON

Count One (Conspiracy to Deal in Firearms Without a License):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Counts Two and Nine (Dealing Firearms Without a License):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Thirteen (Conspiracy to Commit Robbery of Mail, Money, or Other Property of the United States and Assault on a Federal Officer):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Fourteen (Assault on a Federal Officer With a Deadly or Dangerous Weapon):

Maximum prison term: 20 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Fifteen (Robbery of Mail, Money, or Other Property of the United States):

Maximum prison term: 25 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Sixteen (Using, Carrying, and Brandishing a Firearm During, in Relation to, a Crime of Violence):

Mandatory minimum prison term: 7 years

Maximum prison term: Life

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☒ SUPERSEDING
OFFENSE CHARGED

SEE ATTACHED

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: SEE ATTACHED.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

FILED**DEFENDANT - U.S.**

MARCOS ANTONIO MARTENEZ

NOV 29 2018

DISTRICT COURT NUMBER

CR 18-0560 HSG

 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTH DISTRICT OF CALIFORNIA
 OAKLAND OFFICE
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a re prosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☒ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

4-18-71645 MAG

Name and Office of Person

Furnishing Information on this form ALEX G. TSE

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Samantha Schott

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) ☐ If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☒ On this charge
- 5) ☐ On another conviction } ☐ Federal ☐ State
- 6) ☐ Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
DATE OF
ARREST
 Month/Day/Year
 11/19/2018

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

Penalty Sheet for MARCOS ANTONIO MARTENEZ

Count Thirteen (Conspiracy to Commit Robbery of Mail, Money, or Other Property of the United States and Assault on a Federal Officer):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Fourteen (Assault on a Federal Officer With a Deadly or Dangerous Weapon):

Maximum prison term: 20 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Fifteen (Robbery of Mail, Money, or Other Property of the United States):

Maximum prison term: 25 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Sixteen (Using, Carrying, and Brandishing a Firearm During, in Relation to, a Crime of Violence):

Mandatory minimum prison term: 7 years

Maximum prison term: Life

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☒ SUPERSEDING
OFFENSE CHARGED

SEE ATTACHED

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: SEE ATTACHED.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.**FILED**

JAMES MEDEIROS

NOV 29 2018

DISTRICT COURT NUMBER

CR 18-0560 HSG

 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTH DISTRICT OF CALIFORNIA
 OAKLAND OFFICE
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF)

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
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☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☒ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

4-18-71645 MAG

Name and Office of Person

Furnishing Information on this form ALEX G. TSE

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned)

Samantha Schott

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)
- ☐
- If not detained give date any prior
-
- summons was served on above charges
-
- 2)
- ☐
- Is a Fugitive
-
- 3)
- ☐
- Is on Bail or Release from (show District)

IS IN CUSTODY

- 4)
- ☒
- On this charge
-
- 5)
- ☐
- On another conviction }
- ☐
- Federal
- ☐
- State
-
- 6)
- ☐
- Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
DATE OF
ARREST
 Month/Day/Year
 11/19/2018

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

Penalty Sheet for JAMES MEDEIROS

Count Thirteen (Conspiracy to Commit Robbery of Mail, Money, or Other Property of the United States and Assault on a Federal Officer):

Maximum prison term: 5 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Fourteen (Assault on a Federal Officer With a Deadly or Dangerous Weapon):

Maximum prison term: 20 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Fifteen (Robbery of Mail, Money, or Other Property of the United States):

Maximum prison term: 25 years

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

Count Sixteen (Using, Carrying, and Brandishing a Firearm During, in Relation to, a Crime of Violence):

Mandatory minimum prison term: 7 years

Maximum prison term: Life

Maximum fine: \$250,000

Maximum term of supervised release: 3 years

Forfeiture

Mandatory special assessment: \$100

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

CR 18-560 HSG

VENUE: Oakland

UNITED STATES OF AMERICA,

v.

ANTHONY REED,
BENJAMIN GORMLEY,
JESUS ANGEL SANCHEZ,
JULAAN FAISON,
aka "Juju,"

RAHSAAN FAISON,
aka "SG,"

MARCOS ANTONIO MARTENEZ, and
JAMES MEDEIROS,

DEFENDANT.

FILED

NOV 29 2018

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
OAKLAND OFFICE

SUPERSEDING INDICTMENT

18 U.S.C. § 371 – Conspiracy to Deal Firearms Without a License; 18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without a License; 18 U.S.C. § 924(n) – Traveling Interstate to Promote Illegal Firearms Trafficking; 18 U.S.C. § 371 – Conspiracy to Commit Robbery of Mail, Money, or Other Property of the United States and to Assault a Federal Officer; 18 U.S.C. § 2114(a) – Robbery of Money and Property of the United States; 18 U.S.C. § 111(b) – Assault on a Federal Officer With a Deadly or Dangerous Weapon; 18 U.S.C. § 924(c)(1)(A)(ii) – Using, Carrying, and Brandishing a Firearm During, and in Relation to, a Crime of Violence; 18 U.S.C. § 2 – Aiding and Abetting; 18 U.S.C. §§ 924(d), 981(a)(1)(C), 28 U.S.C. § 2461 – Criminal Forfeiture

A true bill.

Heidi Gwara

Foreman

Filed in open court this 29 day of NOVEMBER 2018

Joy Garcia

Clerk

Bail, \$

*no bail warrant for only
Julaan Faison*

no process for others

ALEX G. TSE (CABN 152348)
United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANTHONY REED,
BENJAMIN GORMLEY,
JESUS ANGEL SANCHEZ,
JULAAN FAISON,
aka "Juju,"
RAHSAAN FAISON,
aka "SG,"
MARCOS ANTONIO MARTENEZ, and
JAMES MEDEIROS,

Defendants.

NO. CR 18-560 HSG

VIOLATIONS: 18 U.S.C. § 371 – Conspiracy to
Deal Firearms Without a License; 18 U.S.C.
§ 922(a)(1)(A) – Dealing Firearms Without a License;
18 U.S.C. § 924(n) – Traveling Interstate to Promote
Illegal Firearms Trafficking; 18 U.S.C. § 371 –
Conspiracy to Commit Robbery of Mail, Money, or
Other Property of the United States and to Assault a
Federal Officer; 18 U.S.C. § 2114(a) – Robbery of
Money and Property of the United States; 18 U.S.C.
§ 111(b) – Assault on a Federal Officer With a
Deadly or Dangerous Weapon; 18 U.S.C. §
924(c)(1)(A)(ii) – Using, Carrying, and Brandishing a
Firearm During, and in Relation to, a Crime of
Violence; 18 U.S.C. § 2 – Aiding and Abetting; 18
U.S.C. §§ 924(d), 981(a)(1)(C), 28 U.S.C. § 2461 –
Criminal Forfeiture

OAKLAND VENUE

SUPERSEDING INDICTMENT

SUPERSEDING INDICTMENT
CR 18-560 HSG

1 The Grand Jury charges:

2 COUNT ONE: (18 U.S.C. § 371 – Conspiracy To Deal Firearms Without A License)

3 Introductory Allegations

4 At all times relevant to this Superseding Indictment:

- 5 1. Defendant Anthony REED (REED) was a resident of North Las Vegas, Nevada, but
- 6 stayed at various locations in Alameda County when visiting the Northern District of California.
- 7 2. Defendant Benjamin GORMLEY (GORMLEY) was a resident of Hayward, California.
- 8 3. Defendant Jesus Angel SANCHEZ (SANCHEZ) was a resident of Oakland, California.
- 9 4. Defendants Julaan FAISON, also known as “Juju” (J. FAISON) and Rahsaan FAISON,
- 10 also known as “SG” (R. FAISON) were residents of San Leandro, California.
- 11 5. Defendants REED, GORMLEY, J. FAISON, and R. FAISON maintained Snapchat
- 12 accounts.
- 13 6. At all times relevant to this Superseding Indictment, none of the defendants named
- 14 herein, were licensed to import, manufacture, or deal firearms under the provision of Chapter 44, Title
- 15 18, United States Code.

16 Object of the Conspiracy

17 7. Beginning on a date unknown to the Grand Jury, but no later than January 2018, and

18 continuing to a date unknown to the Grand Jury, but to at least October 2018, in the Northern District of

19 California and elsewhere, the defendants,

20 ANTHONY REED,
 21 BENJAMIN GORMLEY,
 JESUS ANGEL SANCHEZ,
 22 JULAAN FAISON,
 aka “Juju,” and
 23 RAHSAAN FAISON,
 aka “SG,”

24 not being licensed importers, licensed manufacturers, and licensed dealers of firearms, within the

25 meaning of Chapter 44, Title 18, United States Code, did knowingly and willfully conspire and agree

26 together and with each other, and with other persons both known and unknown to the Grand Jury, to

27 engage in the business of dealing in firearms, in violation of Title 18, United States Code, Section

28

1 922(a)(1)(A).

2 Manner and Means

3 8. Defendants REED, J. FAISON, and R. FAISON would purchase firearms through private
4 party sales in Nevada. At the time they would purchase the firearms, these defendants would intend to
5 transfer and sell the firearms to another person.

6 9. Defendants REED, J. FAISON and R. FAISON would travel from Alameda County,
7 California, in the Northern District of California, to Las Vegas, Nevada, in the District of Nevada, for
8 the purpose of obtaining firearms to sell in the Northern District of California.

9 10. Defendants REED, J. FAISON, and R. FAISON would transport firearms back to
10 Alameda County, California, in the Northern District of California, for the purpose of selling the
11 firearms without a license.

12 11. Defendants REED, GORMLEY, SANCHEZ, J. FAISON, and R. FAISON would then
13 illegally sell and transfer the firearms to other individuals in the Northern District of California and
14 elsewhere.

15 12. Defendants REED and J. FAISON would advertise these firearms for sale on their
16 Snapchat accounts. Defendants REED and J. FAISON would then negotiate the sale of the firearms
17 through Snapchat messages, Snapchat calls, and over the phone.

18 13. Defendant GORMLEY would store and maintain firearms for defendant REED in the
19 Northern District of California, and would conduct firearms sales transactions on defendant REED's
20 behalf, when defendant REED would be in Las Vegas, Nevada.

21 14. Defendant SANCHEZ would store and maintain firearms for defendant REED and would
22 provide his vehicle as a location for defendant REED to sell firearms.

23 Overt Acts

24 15. In furtherance of the conspiracy, and to accomplish its objects, the defendants and others
25 committed various overt acts in the Northern District of California and elsewhere, including but not
26 limited to the following:
27
28

1 (1) On or about January 21, 2018, with the approval of defendant J. FAISON, a co-
2 conspirator known to the Grand Jury offered to sell firearms to an individual.

3 (2) On or about January 23, 2018, defendants J. FAISON and R. FAISON sold two
4 firearms, namely, one Smith and Wesson SD9 VE pistol bearing serial number FZC8300, and one Glock
5 Model 19 9mm pistol bearing serial number ACLB464, to the individual in exchange for \$1,900 in cash.

6 (3) Between February 15, 2018, and February 16, 2018, with the approval of
7 defendant REED, a co-conspirator known to the Grand Jury offered to sell firearms to an individual.

8 (4) At defendant REED's direction, a co-conspirator known to the Grand Jury then
9 coordinated the time for the sale with defendant GORMLEY.

10 (5) On or about February 16, 2018, with the approval of defendant REED, defendant
11 GORMLEY sold two firearms, namely, one Glock Model 22 pistol bearing serial number NET740, and
12 one Glock Model 19 pistol bearing serial number WWT934, to the individual in exchange for \$2,400 in
13 cash.

14 (6) Between February 17, 2018, and February 20, 2018, with the approval of
15 defendant REED, a co-conspirator known to the Grand Jury offered to sell firearms to an individual.

16 (7) On or about February 22, 2018, a co-conspirator known to the Grand Jury,
17 together with defendants REED and GORMLEY, sold three firearms, namely, one Glock Model 21 .45
18 caliber pistol bearing serial number WDE940, one Glock Model 27 .40 caliber pistol bearing serial
19 number BCLP212, and one Glock Model 27 .40 caliber pistol bearing serial number BBMS152, to the
20 individual in exchange for \$3,500 in cash.

21 (8) On or about July 10, 2018, defendant REED transported firearms from Las Vegas,
22 Nevada, to Oakland, California, for the purpose of selling the firearms without a license.

23 (9) On or about July 11, 2018, defendant REED sold two firearms, namely, one
24 Glock Model 19C 9mm caliber pistol bearing serial number BFMX386, and one Glock Model 27 .40
25 S&W caliber pistol bearing serial number BFBS106, to an individual in exchange for \$2,000 in cash.

26 (10) On or about July 23, 2018, defendant REED advertised multiple firearms for sale
27 and instructed a co-conspirator known to the Grand Jury to coordinate the purchase of the firearms with
28

1 defendant J. FAISON.

2 (11) On or about July 31, 2018, defendant REED negotiated the sale of firearms to an
3 individual. Defendant R. FAISON was present with defendant REED while defendant REED negotiated
4 the sale of the firearms, and at one point answered defendant REED's phone during the course of
5 negotiations.

6 (12) On or about July 31, 2018, defendant REED sold one firearm, namely, one HS
7 Produkt XDM 9mm pistol bearing serial number MG426760, to an individual in exchange for \$900 in
8 cash.

9 (13) Between August 4, 2018, and August 7, 2018, defendant REED negotiated the
10 sale of multiple firearms to an individual.

11 (14) On or about August 7, 2018, defendants REED and SANCHEZ sold six firearms,
12 namely, one Para-Ordinance P13 .45 pistol bearing serial number RM5590, one FNH 509 pistol bearing
13 serial number GKS0019881, one H&K VP9 pistol bearing serial number 224-196754, one Glock Model
14 36 pistol bearing serial number PTU767, one HS Produkt XD45 pistol bearing serial number S3244608,
15 and one Smith and Wesson SD9 pistol bearing serial number FXW5518, to an individual in exchange
16 for \$4,150 in cash.

17 (15) On or about September 27, 2018, defendant REED traveled from the Northern
18 District of California to Las Vegas, Nevada, for the purpose of obtaining firearms to sell without a
19 license.

20 (16) On or about September 30, 2018, defendant REED transported firearms from Las
21 Vegas, Nevada, to the Northern District of California.

22 (17) Between September 28, 2018, and October 1, 2018, defendant REED negotiated
23 the sale of multiple firearms.

24 (18) On or about October 1, 2018, defendants REED and SANCHEZ sold six firearms,
25 namely, one HS Produkt Springfield Armory pistol bearing serial number XD802875, one Glock Model
26 17 pistol bearing serial number BGFE528, one Glock Model 36 pistol bearing serial number BBTY371,
27 one Glock 22 pistol bearing serial number TLV514, one Taurus Millennium G2 9mm pistol bearing
28

1 serial number TKU37770, and one Beretta Model 3032 Tomcat .32 ACP caliber pistol bearing serial
2 number DAA243496, to an individual in exchange for \$5,000 in cash.

3 (19) Between September 30, 2018, and October 2, 2018, defendant J. FAISON
4 negotiated the sale of multiple firearms.

5 (20) On or about October 2, 2018, defendants J. FAISON and R. FAISON sold four
6 firearms, namely, one Smith & Wesson M&P 9mm bearing serial number NBM0545, one Glock Model
7 43 9mm pistol bearing serial number BHVB575, one Glock Model 43 9mm pistol bearing serial number
8 BEMS683, and one Zastava Model PAP M85 pistol bearing serial number M85PV007285, to an
9 individual in exchange for \$4,260 in cash.

10 (21) Between October 15, 2018, and October 18, 2018, defendant REED transported
11 firearms from Las Vegas, Nevada, to Oakland, California, for the purpose of selling the firearms without
12 a license.

13 (22) On or about October 18, 2018, defendants REED and SANCHEZ sold nine
14 pistols, namely, one Armscor Model 1911 .45 caliber pistol bearing serial number RIA1328714, one
15 Glock pistol bearing serial number BHZP369, one Ruger LC9 9mm pistol bearing serial number 323-
16 79338, one Taurus International PT738 .380 caliber pistol bearing serial number 34462E, one Beretta
17 92S 9mm pistol bearing serial number U11244Z, one HS Produkt XD45 .45 caliber pistol bearing serial
18 number HG100171, one CZ P-07 9mm pistol bearing serial number B788399, one Walther PPS M2
19 9mm pistol bearing serial number AT0404, and one Anderson Manufacturing AM-15 pistol, bearing
20 serial number 16231541, to an individual in exchange for \$7,800 in cash.

21 All in violation of Title 18, United States Code, Sections 371 and 922(a)(1)(A).
22

23 COUNT TWO: (18 U.S.C. §§ 922(a)(1)(A) and 2 – Dealing Firearms Without A License)

24 16. On or about January 23, 2018, in the Northern District of California, defendants,

25 JULAAN FAISON,
26 aka “Juju,” and
27 RAHSAAN FAISON,
28 aka “SG,”

1 not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code,
2 did willfully engage in the business of dealing firearms, namely, one Smith and Wesson SD9 VE pistol
3 bearing serial number FZC8300, and one Glock Model 19 9mm pistol bearing serial number ACLB464,
4 and aided and abetted the same.

5 All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

6
7 COUNT THREE: (18 U.S.C. §§ 922(a)(1)(A) and 2 – Dealing Firearms Without A License)

8 17. On or about February 16, 2018, in the Northern District of California, defendants,

9 ANTHONY REED and
10 BENJAMIN GORMLEY,

11 not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code,
12 did willfully engage in the business of dealing firearms, namely, one Glock Model 22 pistol bearing
13 serial number NET740, and one Glock Model 19 pistol bearing serial number WWT934, and aided and
14 abetted the same.

15 All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

16
17 COUNT FOUR: (18 U.S.C. §§ 922(a)(1)(A) and 2 – Dealing Firearms Without A License)

18 18. On or about February 22, 2018, in the Northern District of California, defendants,

19 ANTHONY REED and
20 BENJAMIN GORMLEY,

21 not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code,
22 did willfully engage in the business of dealing firearms, namely, one Glock Model 21 .45 caliber pistol
23 bearing serial number WDE940, one Glock Model 27 .40 caliber pistol bearing serial number BCLP212,
24 and one Glock Model 27 .40 caliber pistol bearing serial number BBMS152, and aided and abetted the
25 same.

26 All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

1 COUNT FIVE: (18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without A License)

2 19. On or about July 11, 2018, in the Northern District of California, defendant,
 3 ANTHONY REED,
 4 not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
 5 did willfully engage in the business of dealing firearms, namely, one Glock Model 19C 9mm caliber
 6 pistol bearing serial number BFMX386, and one Glock Model 27 .40 S&W caliber pistol bearing serial
 7 number BFBS106.

8 All in violation of Title 18, United States Code, Section 922(a)(1)(A).
 9

10 COUNT SIX: (18 U.S.C. § 922(a)(1)(A) – Dealing Firearms Without A License)

11 20. On or about July 31, 2018, in the Northern District of California, defendant,
 12 ANTHONY REED,
 13 not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code,
 14 did willfully engage in the business of dealing firearms, namely, one HS Produkt XDM 9mm pistol
 15 bearing serial number MG426760.

16 All in violation of Title 18, United States Code, Section 922(a)(1)(A).
 17

18 COUNT SEVEN: (18 U.S.C. §§ 922(a)(1)(A) and 2 – Dealing Firearms Without A License)

19 21. On or about August 7, 2018, in the Northern District of California, defendants,
 20 ANTHONY REED and
 21 JESUS ANGEL SANCHEZ,
 22 not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code,
 23 did willfully engage in the business of dealing firearms, namely, one Para-Ordinance P13 .45 pistol
 24 bearing serial number RM5590, one FNH 509 pistol bearing serial number GKS0019881, one H&K
 25 VP9 pistol bearing serial number 224-196754, one Glock Model 36 pistol bearing serial number
 26 PTU767, one HS Produkt XD45 pistol bearing serial number S3244608, and one Smith and Wesson
 27 SD9 pistol bearing serial number FXW5518, and aided and abetted the same.
 28

1 All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

2
3 COUNT EIGHT: (18 U.S.C. §§ 922(a)(1)(A) and 2 – Dealing Firearms Without A License)

4 22. On or about October 1, 2018, in the Northern District of California, defendants,

5 ANTHONY REED and
6 JESUS ANGEL SANCHEZ,

7 not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code,
8 did willfully engage in the business of dealing firearms, namely, one HS Produkt Springfield Armory
9 pistol bearing serial number XD802875, one Glock Model 17 pistol bearing serial number BGFE528,
10 one Glock Model 36 pistol bearing serial number BBTY371, one Glock 22 pistol bearing serial number
11 TLV514, one Taurus Millennium G2 9mm pistol bearing serial number TKU37770, and one Beretta
12 Model 3032 Tomcat .32 ACP caliber pistol bearing serial number DAA243496, and aided and abetted
13 the same.

14 All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

15
16 COUNT NINE: (18 U.S.C. §§ 922(a)(1)(A) and 2 – Dealing Firearms Without A License)

17 23. On or about October 2, 2018, in the Northern District of California, defendants,

18 JULAAN FAISON,
19 aka “Juju,” and
20 RAHSAAN FAISON,
aka “SG,”

21 not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code,
22 did willfully engage in the business of dealing firearms, namely, one Smith & Wesson M&P 9mm
23 bearing serial number NBM0545, one Glock Model 43 9mm pistol bearing serial number BHVB575,
24 one Glock Model 43 9mm pistol bearing serial number BEMS683, and one Zastava Model PAP M85
25 pistol bearing serial number M85PV007285, and aided and abetted the same.

26 All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

1 COUNT TEN: (18 U.S.C. §§ 922(a)(1)(A) and 2 – Dealing Firearms Without A License)

2 24. On or about October 18, 2018, in the Northern District of California, defendants,

3 ANTHONY REED and
4 JESUS ANGEL SANCHEZ,

5 not being licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code,
6 did willfully engage in the business of dealing firearms, namely, one Armscor Model 1911 .45 caliber
7 pistol bearing serial number RIA1328714, one Glock pistol bearing serial number BHZP369, one Ruger
8 LC9 9mm pistol bearing serial number 323-79338, one Taurus International PT738 .380 caliber pistol
9 bearing serial number 34462E, one Beretta 92S 9mm pistol bearing serial number U11244Z, one HS
10 Produkt XD45 .45 caliber pistol bearing serial number HG100171, one CZ P-07 9mm pistol bearing
11 serial number B788399, one Walther PPS M2 9mm pistol bearing serial number AT0404, and one
12 Anderson Manufacturing AM-15 pistol, bearing serial number 16231541, and aided and abetted the
13 same.

14 All in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

15
16 COUNT ELEVEN: (18 U.S.C. § 924(n) – Traveling Interstate to Promote Illegal Firearms
17 Trafficking)

18 25. On a date unknown to the Grand Jury, but between June 1, 2018, and July 10, 2018, in
19 the Northern District of California and elsewhere, the defendant,

20 ANTHONY REED,

21 with the intent to engage in conduct that constitutes a violation of Title 18, United States Code, Section
22 922(a)(1)(A), that is, engaging in the business of dealing firearms without a license, did travel from
23 California to Nevada, and acquired a firearm, specifically, a Glock Model 27 .40 caliber pistol bearing
24 serial number BFBS106, in furtherance of the purpose of engaging in the business of dealing in firearms
25 without a license.

26 All in violation of Title 18, United States Code, Section 924(n).
27
28

1 COUNT TWELVE: (18 U.S.C. § 924(n) – Traveling Interstate to Promote Illegal Firearms
2 Trafficking)

3 26. On or about September 27, 2018, in the Northern District of California and elsewhere, the
4 defendant,

5 ANTHONY REED,

6 with the intent to engage in conduct that constitutes a violation of Title 18, United States Code, Section
7 922(a)(1)(A), that is, engaging in the business of dealing firearms without a license, did travel from
8 California to Nevada, and acquired a firearm, specifically, a Glock Model 17 9mm caliber pistol bearing
9 serial number BGFE528, in furtherance of the purpose of engaging in the business of dealing in firearms
10 without a license.

11 All in violation of Title 18, United States Code, Section 924(n).

12
13 COUNT THIRTEEN: (18 U.S.C. § 371 – Conspiracy to Commit Robbery of Mail, Money, or Other
14 Property of the United States and to Assault a Federal Officer)

15 Objects of the Conspiracy

16 27. Beginning on a date unknown to the Grand Jury, but no later than November 15, 2018,
17 and continuing through November 19, 2018, in the Northern District of California, the defendants,

18 ANTHONY REED,
19 JESUS ANGEL SANCHEZ,
20 RAHSAAN FAISON,
21 aka "SG,"
22 MARCOS ANTONIO MARTENEZ, and
23 JAMES MEDEIROS,

24 did knowingly and intentionally conspire and agree together and with each other to:

25 (1) forcibly assault a person having lawful charge, control, and custody of any money
26 of the United States with the intent to rob, steal, and purloin such money, in violation of Title 18, United
27 States Code, Section 2114(a); and

28 (2) forcibly assault a federal officer, that is, a Special Agent with the Bureau of
Alcohol, Tobacco, Firearms, and Explosives (ATF), while he was engaged in and on account of his

1 official duties, by means of a deadly and dangerous weapon, namely, a firearm, in violation of Title 18,
2 United States Code, Section 111(b).

3 Overt Acts

4 28. In furtherance of the conspiracy, and to accomplish its objects, the defendants and others
5 committed various overt acts in the Northern District of California, including but not limited to the
6 following:

7 (1) On or about November 15, 2018, defendant REED obtained contact information
8 for an individual known to the Grand Jury, who was in fact an ATF undercover agent, in order to
9 coordinate a meeting with that individual. REED provided that contact information to defendant
10 SANCHEZ.

11 (2) Between November 15, 2018, and November 19, 2018, defendant SANCHEZ
12 contacted the ATF undercover agent and coordinated the sale of multiple firearms to the ATF
13 undercover agent in exchange for \$8,000. Defendant SANCHEZ agreed to meet with the individual on
14 or about November 19, 2018, at a predetermined meeting location in Oakland, California.

15 (3) On or about November 19, 2018, defendant REED traveled in a red Impala to
16 meet with defendant SANCHEZ in front of defendant SANCHEZ's home in Oakland, California, in
17 order to coordinate the robbery of the undercover agent.

18 (4) Defendant REED conversed with defendant SANCHEZ before returning to the
19 red Impala.

20 (5) Defendant REED got back into the passenger seat of the red Impala and traveled
21 to a second location, close to the predetermined meeting location.

22 (6) At the predetermined meeting location, defendant MEDEIROS exited the red
23 Impala and met with defendants SANCHEZ and MARTENEZ to coordinate the robbery of the ATF
24 undercover agent.

25 (7) At the predetermined meeting location in Oakland, California, defendant
26 SANCHEZ met with the ATF undercover agent, and told the ATF undercover agent to follow defendant
27 SANCHEZ to the rear of a building in order to complete the purported firearms transaction.

(8) After defendant SANCHEZ and the ATF undercover agent reached the rear of the building, defendants MEDEIROS and MARTENEZ drew pistols from their clothing and pointed them at the ATF undercover agent.

(9) Defendants SANCHEZ, MEDEIROS, and MARTENEZ demanded that the ATF undercover agent give them the \$8,000 in United States currency the ATF undercover agent had brought for the firearms transaction, as well as the ATF undercover agent's car keys and firearm, all of which belonged to the United States.

(10) Defendant MEDEIROS grabbed hold of the ATF undercover agent and searched his pockets, while defendant MARTENEZ pointed a firearm at the ATF undercover agent from a few feet away and the defendants took the \$8,000 in United States currency, the ATF undercover agent's firearm, and the ATF undercover agent's car keys.

(12) Defendants SANCHEZ and MEDEIROS left together, while defendant MARTENEZ pointed his firearm at the ATF undercover agent.

(13) Defendant SANCHEZ took possession of the \$8,000 in United States Currency and the ATF undercover agent's keys and left the area. Defendant MEDEIROS returned to the red Impala, driven by R. FAISON, and left the area with defendants R. FAISON and REED.

All in violation of Title 18, United States Code, Sections 371, 2114(a), and 111(b).

COUNT FOURTEEN: (18 U.S.C. §§ 2114(a) and 2 – Robbery of Mail, Money, or Other Property of the United States)

29. On or about November 19, 2018, in the Northern District of California, the defendants,

ANTHONY REED,
JESUS ANGEL SANCHEZ,
RAHSAAN FAISON,
aka "SG,"
MARCOS ANTONIO MARTENEZ, and
JAMES MEDEIROS,

did forcibly assault a person having lawful charge, control, and custody of any money of the United States and did so with the intent to rob, steal, and purloin such money, and in effecting the robbery, did

1 put the life of the person having custody of the money in jeopardy by the use of dangerous weapons,
2 namely, firearms, and did aid and abet the same.

3 All in violation of Title 18, United States Code, Sections 2114(a) and 2.

4
5 COUNT FIFTEEN: (18 U.S.C. §§ 111(b) and 2 – Assault on a Federal Officer with a Deadly
6 or Dangerous Weapon)

7 30. On or about November 19, 2018, in the Northern District of California, the defendants,

8 ANTHONY REED,
9 JESUS ANGEL SANCHEZ,
10 RAHSAAN FAISON,
11 aka “SG,”
12 MARCOS ANTONIO MARTENEZ, and
13 JAMES MEDEIROS,

14 did forcibly assault a federal officer, namely, a Special Agent of the Bureau of Alcohol, Tobacco,
15 Firearms, and Explosives, using deadly and dangerous weapons, namely, firearms, while such federal
16 officer was engaged in his official duties, and did aid and abet the same.

17 All in violation of Title 18, United States Code, Sections 111(b) and (2).

18
19 COUNT SIXTEEN: (18 U.S.C. §§ 924(c)(1)(A)(ii) and 2 – Using, Carrying, and Brandishing a
20 Firearm During, and in Relation to, a Crime of Violence)

21 31. On or about November 19, 2018, in the Northern District of California, the defendants,

22 ANTHONY REED,
23 JESUS ANGEL SANCHEZ,
24 RAHSAAN FAISON,
25 aka “SG,”
26 MARCOS ANTONIO MARTENEZ, and
27 JAMES MEDEIROS,

28 did knowingly use, carry, and brandish firearms during and in relation to crimes of violence, namely,
Robbery of Mail, Money, or Other Property of the United States, and Assault on a Federal Officer with a
Deadly or Dangerous Weapon, as alleged in Counts Fourteen and Fifteen of this Superseding
Indictment, which crimes may be prosecuted in a court of the United States, and did aid and abet the

1 same.

2 All in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii) and 2.

3
4 FORFEITURE ALLEGATION: (18 U.S.C. §§ 924(d)(1), 981(a)(1)(C), 28 U.S.C. § 2641(c) –
5 Forfeiture)

6 32. The factual allegations contained in Counts One through Sixteen of this Superseding
7 Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging
8 forfeiture pursuant to the provisions of 18 U.S.C. §§ 924(d)(1), 981(a)(1)(C), and 28 U.S.C. § 2461(c).

9 33. Upon conviction of any of the offenses alleged in Counts One through Twelve, Fifteen,
10 and Sixteen above, the defendants,

11 ANTHONY REED,
12 BENJAMIN GORMLEY,
13 JESUS ANGEL SANCHEZ,
14 JULAAN FAISON,
15 aka “Juju,”
16 RAHSAAN FAISON,
17 aka “SG,”
18 MARCOS ANTONIO MARTENZ, and
19 JAMES MEDEIROS,

20 shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearm
21 or ammunition involved in or used in any knowing violation of said offenses, including but not limited
22 to the following property:

- 23 (i) one .380 caliber, AMT, Back Up pistol seized on November 19, 2018, and any
24 ammunition seized or associated with it.

25 34. Upon conviction of the offense alleged in Count Fourteen above, the defendants,

26 ANTHONY REED,
27 JESUS ANGEL SANCHEZ,
28 RAHSAAN FAISON,
aka “SG,”
MARCOS ANTONIO MARTENEZ, and
JAMES MEDEIROS,

shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and
1956(c)(7), and Title 28, United States Code, Section 2461, all property, real or personal, constituting

1 and derived from proceeds the defendant obtained directly and indirectly as the result of the offense,
2 including but not limited to the following property:

3 (i) \$8,000 in United States currency seized on or about November 19, 2018.

4 35. If any of the property described above, as a result of any act or omission of the defendant:

5 (i) cannot be located upon the exercise of due diligence;

6 (ii) has been transferred or sold to, or deposited with, a third party;

7 (iii) has been placed beyond the jurisdiction of the court;

8 (iv) has been substantially diminished in value; or

9 (v) has been commingled with other property which cannot be divided without
10 difficulty,

11 any and all interest defendant has in any other property (not to exceed the value of the above forfeitable
12 property) shall be forfeited to the United States pursuant to Title 21, United States Code, Section 853(p),
13 as incorporated by Title 28, United States Code, Section 2461(c).

14 All pursuant to 18 U.S.C. §§ 924(d), 981(a)(1)(C), 28 U.S.C. § 2461, and Federal Rule of
15 Criminal Procedure 32.2.

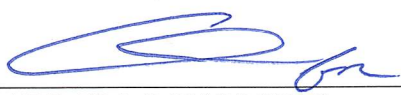
16
17 DATED:

18 11/29/18

A TRUE BILL.

19 
FOREPERSON

20 ALEX G. TSE
21 United States Attorney

22 
23 BARBARA J. VALLIERE
24 Chief, Criminal Division

25
26 (Approved as to form: )
27 SAUSA SAMANTHA SCHOTT
28